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November 2, 2016

Via US mail and E-mail

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America, LLC
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Via US mail and E-mail

Richard Anthony Sheehy
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Re: Juan Santiago's injuries arising from the May 5, 2016, explosion involving
Case IH model 8230 combine equipped with Bosch switches

Dear Ms. Lawrence and Mr. Sheehy:

I am writing to you in your capacities as counsel for Case IH, CNH Industrial America, LLC, Robert Bosch GmbH, and Robert Bosch LLC.

Please accept this letter as presuit notice that Juan Santiago is pursuing claims for strict product liability, negligence (including negligent undertaking and gross negligence), breach of warranty and violations of the Texas Deceptive Trade Practices Act. These claims relate to his catastrophic injuries suffered on May 5, 2016, in Concho County, Texas, when fumes inside the battery box of a Case IH model 8230 combine (product identification number YDG222637) ignited and the battery box cover blew off, striking him in the head and face.

Please also accept this letter as a formal request to preserve the following evidence in your clients' actual or constructive possession:

- the research and development and design documents and files and communications regarding the Case IH model 8230 combine,
- the design revisions and revision history documents and files and communications regarding the Case IH model 8230 combine,
- the testing used to validate the design and design revisions regarding the Case IH model 8230 combine as well as the documents and files and

communications related to that testing,

- the training and work procedure materials for the designers who designed and revised the design for the Case IH model 8230 combine,
- the failure modes and effects analysis related to any aspect of the Case IH model 8230 combine,
- the warnings and instructions applicable to the Case IH model 8230 combine,
- the training and work procedure guidelines and other materials for those who were authorized to work on the warnings and instructions applicable to the Case IH model 8230 combine,
- the documentation of testing related to the decisions concerning any aspect of the Case IH model 8230 combine, including its design and warnings or instructions,
- the marketing research and advertising materials for the Case IH model 8230 combine,
- the documentation comparing the in-field performance and claims and reported malfunction incidents of the Case IH model 8230 combine with other combines made or marketed by Case IH and marketed as a comparable combine,
- the research and documentation and files and communications addressing the phenomenon of battery explosions including – but not limited to – addressing potential causes or consequences of battery explosions,
- the data and communications your clients have exchanged with governmental agencies concerning the Case IH model 8230 combine,
- the documents and communications and files for warranty claims, property damage claims, injury claims, death claims, and lawsuits involving the Case IH model 8230 combine and other agricultural machinery with similar batteries or electrical systems or battery boxes or switches made or sold by Bosch or similar warnings or instructions or other precautions against battery explosions,
- the research and development and design documents and files and communications regarding the switches Bosch made which were of the same type as the switches proximate to the battery box on the Case IH model 8230 combine at the time of the May 5, 2016 incident (referred to as "the Bosch switch"),
- the design revisions and revision history documents and files and communications regarding the Bosch switch,
- the testing used to validate the design and design revisions regarding the Bosch switch as well as the documents and files and communications related to that testing,

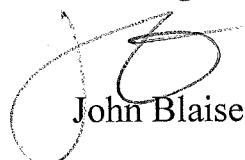
Ms. Lawrence, Mr. Sheehy

Page 3

- the training and work procedure materials for the designers who designed and revised the design for the Bosch switch,
- the failure modes and effects analysis applicable to the Bosch switch,
- the manufacturing and assembly manuals and specifications and tolerances and limits applicable to the Bosch switch,
- the training and work procedure materials for the makers and inspectors who were authorized to build or inspect the Bosch switch,
- the documentation of quality inspection and standards applicable to the Bosch switch,
- the marketing research and advertising materials and promotional literature for the Bosch switch and the other documents and communications which convey the foreseen uses of the switch or categorize which uses of the switch were or were not foreseen or suitable or appropriate,
- the documentation comparing the in-field performance and claims and reported malfunction incidents of the Bosch switch with other switches made or marketed by Bosch and its affiliated companies and marketed as a comparable switch,
- the research and documentation and files and communications addressing the phenomenon of battery explosions, including – but not limited to – addressing potential causes or consequences of battery explosions,
- the research and documentation and files and communications addressing manufacturing variances in Bosch switches, including – but not limited to – addressing potential causes or consequences of manufacturing variances,
- the data and communications your clients have exchanged with governmental agencies concerning the Bosch switch,
- the documents and communications and files for warranty claims, property damage claims, injury claims, death claims, and lawsuits involving the Bosch switch, and
- communications between or among Case IH and Bosch (including the affiliated companies and agents of both companies) regarding the selection and sale of the Bosch switch for use in the Case IH model 8230 combine.

Please let me know immediately if this is a matter your clients would like to discuss resolving without litigation.

Best regards,

A handwritten signature in black ink, appearing to read "John Blaise Gsanger", with a large, stylized initial "J" and "G".

John Blaise Gsanger

Ms. Lawrence, Mr. Sheehy

Page 4

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